

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

In re: ROBERT H. CARP

Case No. 15-11575

Chapter 11

Debtor.

**EMERGENCY MOTION TO CONTINUE OR RESCHEDULE FIRST DAY MOTIONS
FOR PETITIONER ROBERT CARP**

Robert Carp (the “Debtor”), and debtor-in-possession in the above-captioned chapter 11 case, by and through himself attorney pro se, hereby moves this Court and the Honorable Judge Feeney to reschedule the hearing for tomorrow, April 30th, to Monday, May 4th, 2015.

BACKGROUND

1. Mr. Carp contacted the United States Bankruptcy Court officials Paula Bachtell, Linda Rogers, and William Harrington and informed them of his recovery from surgery that would not allow him to attend the hearing scheduled for April 30th, 2015.

2. Ms. Bachtell informed Mr. Carp that she would reschedule the meeting she had originally scheduled with him to May 5th, 2015. Ms. Bachtell informed Mr. Carp of the documents she needed to have for the meeting in order to document the case.

3. At 10:14 p.m. on April 28th, Mr. Carp sent the three trustees the email shown in Exhibit A asking for help in rescheduling the hearing scheduled for April 30th, due to his recovery.

4. At 4:36 p.m., Ms. Bechtell informed Mr. Carp that they were opposing his first day motions, and that he should contact the Clerk of the Court to reschedule.

5. Mr. Carp agreed to provide Ms. Bachtell with all the documents she needed, but her office still filed an objection to all of his first day motions without seeing any of the information she requested.

REQUEST FOR RELIEF

Mr. Carp humbly requests this court and the Honorable Judge Feeney to allow him to reschedule his hearing before her until Monday, May 4th, 2015 at which time he will be prepared to proceed and well enough to provide the bulk of the information the court needs to consider his motions.

Dated: April 29, 2015.

/s/Robert H. Carp
Robert H. Carp, Esq.
Attorney Pro Se
Cottens and Carp, LLC.
1215 Chestnut Street

EXHIBIT A



Bob Carp <rcarp@post.harvard.edu>

to Paula.Bachtell, Linda.M.Rogers, USTPRegion01.B. 

Dear Mr. Fitzgerald,

I am writing this and copying your colleagues who have been assigned to my Chapter 11 bankruptcy to inquire who I would ask to reschedule my hearing slated for this Thursday. I am recovering from a bone graft inside my mouth that makes me difficult to understand, and I am also supposed to not really move in order to prevent the stitches from tearing. Ms. Bachtell and Ms. Rogers have agreed to reschedule my appointment with them until May 5th, but I believe I will be able to come to court in the beginning of the week. I'm representing myself pro se. I'm not sure who to contact at the court to reschedule, so any guidance you could offer would be greatly appreciated.

Respectfully,
Robert Carp
